

No. 13-19-00379

FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
8/31/2020 1:16 PM
Court Of Appeals For The Thirteenth District of Texas
KATHY S. MILLS
Clerk

VALSTAY, LLC

Plaintiff - Appellant

v.

TEXAS WINDSTORM INSURANCE ASSOCIATION,

Defendant – Appellee

On Appeal from the Nueces County 28th District Court
District of Texas
CIVIL ACTION NO.: 2017DCV-4203-A

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S REPLY BRIEF**

TO THE HONORABLE JUSTICES OF THE FIFTH CIRCUIT:

Appellant Valstay, LLC files this unopposed motion to extend the time for Valstay to file its Appellant’s reply brief with the clerk of court. In support of this motion, Valstay will show this honorable court as follows:

1. By this motion, Appellant seeks an extension of time of twenty-one days or until Monday, October 5, 2020 to file its Appellant’s reply brief, which is currently due on Monday, September 14, 2020.

2. This motion is Appellant's first request for an extension of time to file its paper copies of their reply brief with the Court.

3. Appellant needs additional time to file its brief because counsel for Appellant has been working from home due to the pandemic, which has caused delays in his practice. Additionally, counsel for Appellant has been required to address other pending legal matters and needs additional time to adequately prepare Appellant's reply brief. In light of these new circumstances, Appellant is requesting the additional time to submit its reply brief.

4. Appellee, Texas Windstorm Insurance Association is not opposed to this extension.

WHEREFORE, PREMISES CONSIDERED, Valstay, requests that the court grant it an extension of time to file Appellant's brief until Monday, October 5, 2020 and award Appellant such other relief as may be proper.

Respectfully submitted,

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By: /s/ Todd Lipscomb
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Attorneys for Appellant

CERTIFICATE OF CONFERENCE

On August 28, 2020, during a telephone conversation, Appellee's counsel, David Salyer, informed Appellant's counsel, Todd Lipscomb, that Appellee was not opposed to this motion for an extension of time.

/s/ Todd Lipscomb
Todd Lipscomb

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2020, Appellant served a true and correct copy of this motion on all counsel for Appellee through the Court's electronic filing system.

David P. Salyer
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P.O. Box 629
Galveston, Texas 77553

J. Stephen Barrick
James R. Old., Jr.
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/s/ Todd Lipscomb
Todd Lipscomb

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Daniel Dominguez on behalf of Edwin Lipscomb
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Status as of 8/31/2020 1:20 PM CST

Associated Case Party: Valstay, LLC

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Daniel Dominguez		daniel@lhllawfirm.com	8/31/2020 1:16:23 PM	SENT

Associated Case Party: Texas Windstorm Insurance Association

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